

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BURBERRY LIMITED; GUERLAIN, SOCIÉTÉ PAR
ACTIONS SIMPLIFIÉE (SAS); GUERLAIN, INC.;
HERMÈS INTERNATIONAL; KENZO; LVMH
FRAGRANCE BRANDS; MICHAEL KORS, L.L.C.;
PARFUMS CHRISTIAN DIOR; and PRL USA
HOLDINGS, INC.,

Plaintiffs,

-against-

VARIOUS JOHN DOES, JANE DOES, and
XYZ COMPANIES,

Defendants.

CIVIL ACTION NO.

19 CV 6445 (JMF)

PRELIMINARY INJUNCTION ORDER

This action having been commenced by Burberry Limited; Guerlain, Société Par Actions Simplifiée (SAS); Guerlain, Inc.; Hermès International; Kenzo; LVMH Fragrance Brands; Michael Kors, L.L.C.; Parfums Christian Dior; and PRL USA Holdings, Inc. (collectively “Plaintiffs”) on September 12, 2019 against Defendants Various John Does, Jane Does, and XYZ Companies, at 264 Canal Street, New York, New York 10013; 416 Broadway, New York, New York 10013; 419 Broadway, New York, New York 10013; 421 Broadway, New York, New York 10013; Canal Street Between Church Street and Broadway, New York, New York 10013; Corners of Greene & Canal Streets, Mercer & Canal Streets, and Broadway & Canal Street, New York, New York 10013; and Vehicles on Mercer Street, North of Canal Street, New York, New York 10013: Black BMW Sedan, North Carolina License Plate No. FJL-2561; White Ford Van, New York License Plate No. GST 2090; and Red Dodge Minivan, New York License Plate No. HZU 1826, alleging trademark counterfeiting and infringement of Plaintiffs’ Federally Registered Trademarks (defined below) and charging defendants with, *inter alia*, trademark counterfeiting, infringement, dilution and false

advertising, and a copy of the Summons, Amended Complaint, Seizure Order, and all supporting papers having been served upon certain of the defendants during civil seizures at the following locations on September 14, 2019: 264 Canal Street, New York, New York 10013; 416 Broadway, New York, New York 10013; 419 Broadway, New York, New York 10013; White Ford Van, New York License Plate No. GST 2090, discovered on Lispenard Street, New York, New York 10013; Red Dodge Minivan, New York License Plate No. HZU 1826, located on Mercer Street, North of Canal Street, New York, New York 10013; and Black Toyota SUV, Ohio License Plate No. HLH-1937, in front of 325A Canal Street, New York, New York 10013 (collectively referred to as “Defendants”);

It appearing to the Court that it has jurisdiction over the subject matter of this action, over Plaintiffs and over Defendants;

The Court having considered the Amended Complaint and the exhibit thereto, Plaintiffs’ Order To Show Cause and accompanying papers and the defendants at the above addresses failing to appear at the hearing on September 25, 2019 after receiving notice of the same on September 14, 2019; and

It further appears that Defendants are, *inter alia*, counterfeiting and infringing Plaintiffs’ Federally Registered Trademarks, in violation of 15 U.S.C. § 1114 and will continue to counterfeit and infringe Plaintiffs’ Federally Registered Trademarks unless restrained by Order of this Court.

Accordingly, the Court concludes as a matter of law:

1. This Court has jurisdiction over the subject matter of all counts of this action and over all the parties hereto;

2. Plaintiffs have established a *prima facie* case of ownership of Plaintiffs’ Federally Registered Trademarks;

3. Plaintiffs are likely to prevail on the merits of this action in showing that Defendants are counterfeiting and infringing Plaintiffs' Federally Registered Trademarks in violation of 15 U.S.C. § 1114;

4. Defendants' actions have caused and will continue to cause immediate and irreparable harm, loss, and damage before a full trial on the merits can be held, in that monetary compensation will not afford adequate relief to Plaintiffs for Defendants' continuing acts of counterfeiting and trademark infringement;

5. The harm to Plaintiffs from the denial of this request for a Preliminary Injunction would outweigh the harm to the legitimate interests of Defendants against whom the Order would be issued and to any third parties; and

6. The public interest would best be served by granting this Preliminary Injunction prior to a full trial on the merits or a default judgment against Defendants.

NOW THEREFORE, it is hereby ORDERED as follows that:

1. The Defendants and their respective principals, officers, agents, servants, employees, and attorneys, and all persons in concert and participation with them are hereby restrained and enjoined, pending termination of this action:

(a) From using Plaintiffs' Federally Registered Trademarks, including but not limited to:

BURBERRY LIMITED

TRADEMARK TRADEMARK	REGISTRATION NUMBER	REGISTRATION DATE	GOODS
BURBERRY	259,571	6-Aug-1929	Piece goods - namely, cloths, and stuffs of wool, worsted, or hair.
BURBERRY	260,843	27-Aug-1929	Clothing - namely, coats and topcoats for men, women, and children; jackets for men, women, and children; breeches for boys; suits for men and boys; waistcoats for men, women, and children; overalls for women and

			children; skirts for outer wear for women and children; capes for men, women, and children; hats and caps for men, women, and children; bonnets for children, hoods and toques for men, women, children; neckties for men, women, and children; stockings and socks for men, women, and children; braces and suspenders for men and children; belts for outer wear for men, women, and children; boots of rubber and fabric or combinations of these materials for men, women, and children; shoes and slippers of leather, rubber, and fabric or combinations of these materials for men, women, and children; gloves for men, women, and children, of leather and fabric.
BURBERRY	1,133,122	15-Apr-1980	Handbags, travelling bags, leather travelling cases, attache cases, leather briefcases, purses, pocket wallets, umbrellas.
BURBERRY	1,607,316	24-Jul-1990	Spectacles, sunglasses, fitted cases, frames and lenses, all for sunglasses or for spectacles.
BURBERRY	1,747,765	19-Jan-1993	Wrist watches and straps and bracelets therefor, and cuff links.
BURBERRY	2,624,684	24-Sep-2002	Retail store services featuring clothing, watches, sunglasses, accessories, shoes, luggage, leather goods, and fragrance.
BURBERRY	2,629,931	8-Oct-2002	Fragrance; non-medicated toilet preparations, namely, perfumes, eau de cologne, and toilet water, cosmetic preparations for the hair, namely, shampoos, soaps for the body, shower gels and bath gels and bath foams; antiperspirants and deodorants; shaving preparations.
BURBERRY	2,875,336	17-Aug-2004	Sunglasses, combined sunglasses, spectacles, optical glasses, fitted frames and lenses for the aforesaid goods; cases and holders for the aforesaid goods; parts and fittings for all the aforesaid goods; cases and holders for portable computers and mobile telephones; watches, clocks and parts and fittings for all the aforesaid goods, wrist watches and straps and bracelets therefor and pocket watches, jewelry, imitation jewellery, tie-pins and cuff links; and jewelry boxes, hat and shoe ornaments all made of precious metal or coated therewith.
BURBERRY	3,879,249	23-Nov-2010	Articles of outer clothing, namely, coats, jackets, rainwear, ponchos, gilets, detachable coat linings, raincoats; blousons; casual coats; polo shirts; blouses; dresses; pyjamas;

			knitwear, namely, jerseys, jumpers, cardigans, sweaters, knitted leggings; shorts; trousers; suits; skirts; jackets; articles of underclothing, namely, boxer shorts, lingerie, loungewear, nightwear, underwear, undergarments; hosiery; headwear; footwear; sports clothing, namely, sweat pants, sweat shirts, swimwear; sports footwear; tracksuits; ready-made linings, namely, finished textile linings for garments; ties; clothing belts; wraps; scarves; shawls and stoles; gloves.
BURBERRY	3,898,440	4-Jan-2011	Articles made from material and textile, namely, bed blankets, blanket throws, children's blankets, lap blankets, towels, handkerchiefs, cushion covers.
BURBERRY	4,004,568	2-Aug-2011	Cosmetics; aftershave preparations; non-medicated preparations for the bath and shower, body care preparations, skin care preparations, nail care preparations and accessories; room fragrances; baby creams, lotions, shampoos.
BURBERRY	4,212,001	25-Sep-2012	Visual and audio recordings featuring music, video, animation, voice, still photography; digital music downloadable from the internet; custom manufacture of clothing, custom manufacture of accessories, namely, bags, briefcases, handbags, wallets, purses, document holders, bags and cases for makeup, key rings, luggage, umbrellas, cases and holders for electronic devices, eyewear and cases for eyewear, belts; entertainment services, namely, production and online distribution of sound, music, and video recordings in the fields of music and fashion; providing non- downloadable music and video recordings in the fields of music and fashion for others via a global computer network; production and distribution of videos in the fields of music and fashion; design of clothing and fashion accessories for others.
BURBERRY	510,077	24-May-1949	Clothing - namely, coats and topcoats for men, women, and children; jackets for men, women, and children; breeches for boys; suits for men and boys; waistcoats for men, women, and children; skirts for outer wear for women and children; capes for men, women, and children; hats and caps for men, women, and children; bonnets for children; hoods and toques for men, women, and children; neckties for men, women, and children; stockings and socks for men, women, and children; braces and suspenders for men and

			children; belts for outer wear for men, women, and children; boots for men, women, and children, of leather and rubber or combinations of these materials; shoes and slippers for men, women, and children; of leather, rubber, and fabric or combinations of these materials; gloves for men, women, and children of leather and fabric.
BURBERRY BRIT	3,029,220	13-Dec-2005	Non-medicated toilet preparations, namely, perfumes, eau de cologne, and toilet water, shower gels and bath gels and bath foams; antiperspirants and deodorants; shaving preparations.
BURBERRY BRIT	3,910,300	25-Jan-2011	Clothing, namely, shirts, polo shirts, dresses, jumpers, sweaters, gilets, t-shirts, jeans, coats, trench coats, jackets.
BURBERRY CHECK	1,241,222	7-Jun-1983	Coats, top coats, jackets, trousers, slacks, waistcoats, skirts, capes, hats, bonnets, berets, shirts, scarves, shawls and blouses.
BURBERRY CHECK	1,855,154	20-Sep-1994	Watches and parts therefor; straps, bracelets for wrist watches; cuff links.
BURBERRY CHECK	2,015,462	12-Nov-1996	Socks.
BURBERRY CHECK	2,022,789	17-Dec-1996	Suitcases, traveling bags, holdalls, suit and garment carriers for travel, attache cases, document cases, briefcases, purses, drawstring pouches, wallets, billfolds, passport holders, key cases, handbags, shoulder bags, credit card cases, business card cases, toilet bags sold empty, toilet cases sold empty, shaving bags sold empty, tie cases for travel, umbrellas and parasols; traveling comforter, namely, fabric blanket-like articles for keeping warm, e.g., when traveling in cold climates, or for use as a stadium blanket; clothing for men and women, namely, scarves, pullovers, cardigans, sweaters, overcoats, raincoats, shirts, belts; slippers for men.
BURBERRY CHECK	2,845,852	25-May-2004	Sunglasses, spectacles, optical glasses; fitted frames and lenses for the aforesaid goods; cases and holders for the aforesaid goods; carrying cases and holders for portable computers and mobile telephones.
BURBERRY CHECK	3,529,814	11-Nov-2008	Non-metal key fobs; blankets, throws, handkerchiefs, textile used as linings for clothing and accessories, fabrics for use in the manufacture of clothing, footwear, headwear,

			<p>hosiery, belts, bags, cases, holders and key rings, umbrellas, watches, jewelry, towels, blankets, throws; Coats, detachable coat linings, rainwear, ponchos, jackets, gilets, jerseys, jumpers, sweaters, blouses, shirts, polo shirts, t-shirts, vests, dresses, skirts, trousers, jeans, shorts, ski wear, sports shirts, sports trousers, sweat shirts, waterproof clothing, namely, coats, jackets, bikinis, sarongs, swimwear, bathrobes, boxer shorts, loungewear, nightwear, undergarments, ties, cravats, footwear, shoes, boots, athletic footwear, slippers, ballet slippers, socks, leggings, caps, hats, head scarves, belts, gloves, mufflers, scarves, shawls, stoles, pashminas, children's and infant's clothing, namely, coats, jackets, ponchos, jerseys, sweaters, blouses, shirts, t-shirts, singlets, vests, tank tops, waistcoats, suits, dresses, skirts, trousers, jeans, shorts, children's headwear, children's swimwear, children's nightwear, children's under garments, and one-piece clothing, headwear, footwear; cloth bibs; teddy bears; retail store services in the fields of clothing, accessories, footwear, headgear, luggage, leather goods, timepieces, jewelry, eyewear and fragrances.</p>
BURBERRY CHECK	4,123,508	10-Apr-2012	<p>Telephones, mobile telephones, mobile electronic devices, namely, PDAs (personal digital assistants), smart phones, personal entertainment devices, namely, electronic book readers, tablet computers, netbooks, electronic notebooks, handheld computers, portable digital audio and/or video players, and accessories for the foregoing, namely, headsets, headphones, covers, fascia, lanyards specially designed for mobile electronic devices and mobile telephones, stylus, battery chargers, phone jewelry and accessory charms for mobile electronic devices; cases and holders for telephones, mobile telephones and mobile electronic devices, namely, for PDAs (personal digital assistants), smart phones, personal entertainment devices in the nature of electronic book readers, tablet computers, netbooks, electronic notebooks, handheld computers and portable digital audio and/or video players.</p>
BURBERRY CHECK	4,166,277	3-Jul-2012	<p>Non-medicated toilet preparations; cosmetic preparations for the bath and shower; non-medicated body and skin care preparations; cosmetic preparations for care of teeth and for hair; nail care preparations and polish; nail accessories, namely, false nails; soaps; anti-</p>

			<p>perspirants, deodorants; perfumes, eau de cologne, eau de toilette and toilet water; essential oils, massage oil; pot pourri, room fragrance and incense; cleaning preparations for leather and non-leather goods; sunglasses, spectacles, optical glasses, fitted frames and lenses for the aforesaid goods, cases and holders for the aforesaid goods, and parts and fittings for all the aforesaid goods; cases and holders specially adapted for use with portable electronic devices, mobile telephones, portable audio and video systems and computers; camera cases; mobile phones and mobile phone accessories, namely, mobile phone covers and skins, charms and lanyards for mobile phones, mobile phone fascias in the nature of protective covers; watches, clocks and parts, fittings and cases for all the aforesaid goods; watch straps and bracelets therefore; jewellery, imitation jewellery, tie-pins, tie clips and cuff links; articles made of precious metals or coated therewith, namely, key rings, charms, badges, shoe ornaments; jewellery boxes and cases; models and figures of precious metal; all-purpose carrying bags, trunks, valises, suitcases, travelling bags, garment bags, baby bags, baby carriers worn on the body, baby harnesses worn on the body, rucksacks, satchels, holdalls, handbags, shoulder bags, shopping bags, wheeled shopping bags; purses, pouches; wallets, key holders made of leather or imitations of leather, credit card holders of leather and imitations of leather, pochettes; labels, luggage labels and tags all made of leather and imitations of leather; cosmetic cases and bags sold empty, cases for manicure sets sold empty; jewellery rolls for travel; umbrellas, parasols; clothing for pets; horse blankets; collars and leashes for animals; textiles and textile items, namely, bed blankets, bed covers, bed linen, cot linen, duvets, and curtains; towels; face cloths; mattress covers; pillowcases; quilts and eiderdowns; bed sheets; table covers; unfitted fabric furniture covers, wall hangings, cushion covers; placemats of textile; handkerchiefs; travelling rugs; pet blankets; textile labels; clothing, namely, shirts, polo shirts, blouses, dresses, shorts, trousers, suits, skirts, jerseys, jumpers, sweaters, cardigans, gilets, t-shirts, singlets, vests, tank tops, waistcoats, jeans, pyjamas, coats, overcoats, trench coats, casual coats, raincoats, jackets, ponchos, blousons, capes, lingerie, underwear, undergarments, sleepwear, loungewear; ski wear, sports</p>
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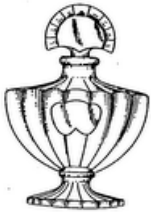

			trousers, sports shorts, sports shirts, sports jackets, sweat pants, sweat shirts, sweat shorts, tracksuits, swimwear; ready-made linings sold as component parts of coats; clothing belts; ties, wraps, serapes, sarongs, scarves, shawls and stoles; gloves; tights, socks, stockings, hosiery, leggings; footwear; headwear.
BURBERRY CHECK	2,689,921	25-Feb-2003	Perfumes, eau de toilettes, body lotion; soaps; personal deodorants; eau de parfums; aftershaves; shampoo for the body; shower gels; bath gels.
BURBERRY CHECK (No Color)	2,728,709	24-Jun-2003	Fabrics for use in the manufacture of clothing, underclothes, swimwear, headwear, footwear, hosiery, socks; and belts; fabrics for use in the manufacture of cosmetic cases and bags, toiletry cases and bags, and shaving cases and bags; fabrics for use in the manufacture of purses, pouches, bags, luggage, carriers, travel bags, and suit and garment bags; fabrics for use in the manufacture of cases and holders for money, documents, keys, glasses, and ties; fabrics for use in the manufacture of umbrellas and parasols and cases thereof; fabrics for use in the manufacture of straps and bracelets for watches, and straps for shoes and bags; fabrics for use in the manufacture of lining for all the foregoing goods; comforters and blankets.
BURBERRY CHECK (No Color)	2,612,272	27-Aug-2002	Retail store services in the fields of clothing, accessories, shoes, luggage, leather goods and fragrances.
BURBERRY CHECK (No Color)	2,732,617	1-Jul-2003	Perfumes, eau de toilettes, eau de parfums; body lotion, soaps; personal deodorants; aftershave; shampoo for the hair and for the body; shower gels; bath gels; articles of luggage, namely, suitcases, athletic and sport bags, beach bags, carry-on bags, clutch bags; duffel and gym bags; overnight bags; school book bags, shoulder bags, tote bags, garment bags for travel, carryall bags, traveling bags, hand bags, leather bags for computers and cameras; wallets and purses; toiletry bags sold empty and cosmetics bags sold empty; brief cases, satchels and portfolios; parasols, umbrellas, walking sticks; leather key fobs, leather key holders; articles of outerclothing, namely, coats, overcoats, trench coats, casual coats, raincoats, jackets and blousons, poloshirts, blouses, dresses, pyjamas, knitwear namely, jumpers, sweaters, gilets, knitted shirts, knitted skirts and knitted scarves; and


			shorts, trousers, suits, skirts, underclothes, hosiery, headwear, footwear, sports clothing namely, sports trousers, sports shorts, sports shirts, sports jackets, sports footwear; tracksuits, garments that can be attached to or detached from coats, raincoats, trench coats, or casual coats for additional warmth; ties, belts, wraps, serapes, scarves, shawls and stoles, gloves.
BURBERRY CHECK (No Color)	4,441,542	26-Nov-2013	Sunglasses, camera cases, spectacles, optical glasses, mobile phone accessories, namely, mobile phone covers charms and lanyards for mobile phones; fitted frames and lenses for the aforesaid goods; cases and holders for the aforesaid goods; parts and fittings for all the aforesaid goods; cases and holders for portable electronic devices, namely, PDAs (personal digital assistants), smart phones, electronic book readers, tablet computers, netbooks, electronic notebooks, handheld computers and portable digital audio and/or video players, mobile telephones, portable audio and video systems and computers; Watches, watch straps and bracelets therefor; jewelry, imitation jewelry, tie-pins, tie clips and cuff links; articles made of precious metals or coated therewith, namely, key rings.
BURBERRY LONDON	3,202,484	23-Jan-2007	Articles of outerclothing, namely, coats, trench coats, casual coats, jackets; shirts, dresses; ties.
EQUESTRIAN KNIGHT DEVICE	2,512,119	27-Nov-2001	Non-medicated toilet preparations, namely, perfumes, eau de cologne, and toilet water, shampoos, shower gels and bath gels; shaving preparations; articles of luggage, namely, suitcases, athletic and sport bags, beach bags, carry-on bags, clutch bags, overnight bags, shoulder bags, tote bags, carryall bags, traveling bags, hand bags, leather bags for computers and cameras; wallets and purses; toiletry bags sold empty and cosmetic bags sold empty; brief cases, satchels and portfolios; cases for personal organizers and for mobile telephones; umbrellas, leather key fobs, leather key holders, and dog coats.
EQUESTRIAN KNIGHT DEVICE w/ B PRORSUM	863,179	7-Jan-1969	Coats, topcoats, jackets, suits, trousers, slacks, shorts, overalls, skirts, capes, hats, caps, bonnets, hoods, berets, neckties, stockings, socks, belts, boots, shoes, slippers, sandals, gloves, shirts, collars, pajamas, dressing gowns, cardigans, sweaters, pullovers,

			scarves, blouses, beach robes, dresses, skiwear, and handkerchiefs.
EQUESTRIAN KNIGHT DEVICE w/ B PRORSUM	1,622,186	13-Nov-1990	Sunglasses; spectacles; frames and lenses.
EQUESTRIAN KNIGHT DEVICE w/ B PRORSUM	2,952,399	17-May-2005	Sunglasses, combined sunglasses, spectacles, optical glasses, fitted frames and lenses for the aforesaid goods; cases and holders for the aforesaid goods; parts and fittings for all the aforesaid goods; computer carrying cases and specialty holsters and cases for carrying mobile telephones; watches, and parts and fittings for all the aforesaid goods, wrist watches and straps and bracelets therefor and jewelry, imitation jewelry, tie-pins and cuff links; and jewelry boxes, all made of precious metal or coated therewith.
EQUESTRIAN KNIGHT DEVICE w/ B PRORSUM	4,036,908	11-Oct-2011	Accessories for covers, and accessory charms for mobile electronic devices; cases and holders for telephones, mobile telephones and mobile electronic devices, namely, smart phones, personal entertainment devices, tablet computers.
EQUESTRIAN KNIGHT DEVICE w/ BB PRORSUM	1,903,508	4-Jul-1995	Watches and parts therefor; bracelets for wrist watches; jewelry; costume jewelry; tie pins and cuff links.
EQUESTRIAN KNIGHT DEVICE w/ BB PRORSUM	3,766,097	30-Mar-2010	Textiles and textile goods, namely, household linen, bed linen, bath linen, bed blankets, blanket throws, children's blankets, beach towels, handkerchiefs, unfitted fabric furniture covers, fabrics for textile use and textile used as lining for clothing, cushion covers.

GUERLAIN SOCIÉTÉ PAR ACTIONS SIMPLIFIÉE (SAS) & GUERLAIN, INC.



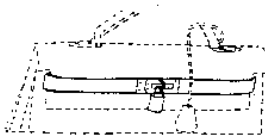

<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>	<u>Owner</u>
GUERLAIN	3	Perfumes, eau de cologne, toilet waters, face cream; face, talcum, and bath powders, loose and in compact form	Dec. 30, 1924	193391	Guerlain, Inc. (NY)
SHALIMAR	3	Perfumes	Aug. 24, 1926	216906	Guerlain, Inc. (NY)
L'HEURE BLEUE	3	Perfumes and toilet water	Mar. 6, 1945	412381	Guerlain, Inc. (NY)


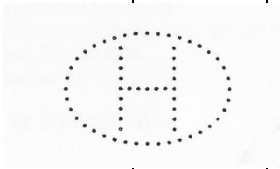

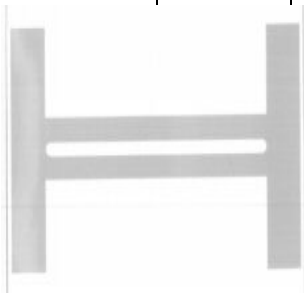
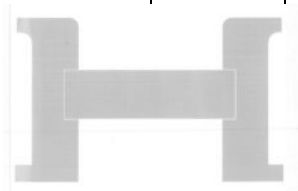
<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>	<u>Owner</u>
APRES L'ONDEE	3	Toilet water	Mar. 6, 1945	412388	Guerlain, Inc. (NY)
MITSOUKO	3	Perfumes and toilet waters	Mar. 6, 1945	412390	Guerlain, Inc. (NY)
	3	Perfume	Dec. 16, 1975	1027122	Guerlain, Inc. (NY)
	3	Toiletries-namely, perfume, eau de toilette, eau de cologne, eau de parfum, toilet soap	Apr. 16, 1985	1330436	Guerlain, Inc. (NY)
JARDINS DE BAGATELLE	3	Toilet water	Apr. 22, 1986	1390453	Guerlain, Inc. (NY)
SAMSARA		Perfumes, perfume de toilette, eau de toilette, body lotion, body shampoo, and skin creams	July 3, 1990	1604258	Guerlain, Inc. (NY)
HERITAGE	3	Eau de toilette, personal deodorant	Dec. 13, 1994	1867402	Guerlain, Inc. (NY)
GUERLAIN	3, 4, & 21	Perfume; eau de toilette; eau de cologne; eau de parfum; eau de senteur (alcohol-free toilet water); parfum de toilette; body shampoo; bath oil; skin cleansing cream; wrinkle removing skin care preparations; skin moisturizer; skin conditioner; skin cream; night cream; body lotion; body milk; bronzing cream; bronzing powder; make-up; foundation make-up; make-up remover; eye shadow; eye-liner; under eye concealer; mascara; eye make-up remover; face powder; lipstick; protective base coat for nails; nail polish; after-shave lotion; after-shave balm; shaving cream; personal deodorant; sun screen preparations; scented talcum powder in class 3 Scented candles in class 4 Cosmetic brushes in class 21	Dec. 19, 1995	1942534	Guerlain (France SAS)

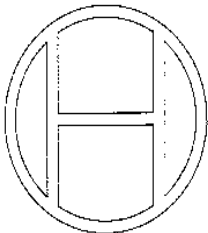


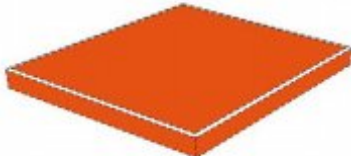
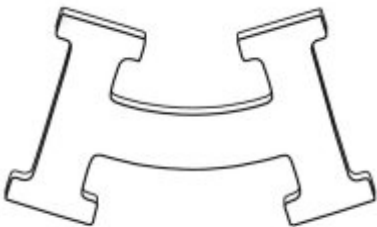
<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>	<u>Owner</u>
AQUA ALLEGORIA	3	Cologne	Aug. 22, 2000	2379207	Guerlain (France SAS)
L'INSTANT DE GUERLAIN	3	Perfume; eau de cologne; toilet waters; perfumed body milks, body lotions, body gels, body oils, and body powders; perfumed soaps; perfumed moisturizing creams; perfumed talcum powder	Aug. 26, 2003	2756404	Guerlain (France SAS)
HABIT ROUGE	3	Eau de toilette, after-shave lotion, personal deodorant, shower gel	Apr. 20, 2004	2834416	Guerlain (France SAS)
INSOLENCE	3	Perfume, perfumery, toilet waters	Aug. 15, 2006	3129090	Guerlain (France SAS)
IDYLLE	3	Perfumery, perfumes, eau de toilette, personal deodorants, cosmetics	Dec. 22, 2009	3729592	Guerlain (France SAS)
	3	Perfumes	May 3, 2011	3953827	Guerlain (France SAS)
LA PETITE ROBE NOIR	3	Perfumery	Jan. 3, 2012	4080150	Guerlain (France SAS)
IMAGINE	3	Perfumes; eau de Cologne; shaving preparations; aftershave balm; body deodorants	Dec. 4, 2018	5620079	Guerlain (France SAS)

HERMÈS INTERNATIONAL

OWNER	TRADEMARK	Reg. Date	Reg. No.	REGISTRAR	Classes
HERMES INTERNATIONAL	HERMÈS	2/29/1972	930149	USA	03
HERMES INTERNATIONAL		12/29/1998	2213940	USA	08, 09, 21, 28, 34
HERMES INTERNATIONAL		6/27/1939	368785	USA	08, 14
HERMES INTERNATIONAL		7/18/1939	369271	USA	14
HERMES INTERNATIONAL		8/1/1939	369681	USA	18
HERMES INTERNATIONAL		8/4/1987	1450841	USA	20
HERMES INTERNATIONAL		8/15/1939	370082	USA	21

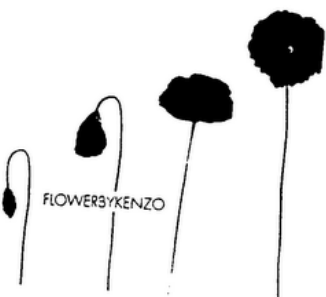

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HERMES INTERNATIONAL		12/27/2005	3036116	USA	35
HERMES INTERNATIONAL		8/15/1978	1099896	USA	42
HERMES INTERNATIONAL		5/1/2001	2447278	USA	08, 09, 16, 20, 24, 28, 34
HERMES INTERNATIONAL		10/8/1985	1364533	USA	21
HERMES INTERNATIONAL		1/6/1970	883588	USA	03, 14, 18, 25
HERMES INTERNATIONAL			3198973	USA	35
HERMES INTERNATIONAL			3036117	USA	35
HERMES INTERNATIONAL		9/24/2002	2623070	USA	37, 40, 41
HERMES INTERNATIONAL		8/15/1978	1099897	USA	42
HERMES INTERNATIONAL		9/4/1984	1292597	USA	03, 09, 14, 16, 18, 24, 25, 28, 34
HERMES INTERNATIONAL			1011908	USA	14
HERMES INTERNATIONAL			1806107	USA	18
HERMES INTERNATIONAL			2436099	USA	03, 08, 09, 14, 16, 18, 20, 24, 25, 28, 34

HERMES INTERNATIONAL			2991927	USA	16, 18
HERMES INTERNATIONAL			3348789	USA	06, 08, 14, 16, 18, 21, 24, 25, 26, 28, 34
HERMES INTERNATIONAL			3564868	USA	06, 08, 14, 16, 18, 20, 21, 22, 24, 25, 26, 28, 34
HERMES INTERNATIONAL	TERRE D'HERMES	4/11/2006	3079963	USA	03
HERMES INTERNATIONAL			3233558	USA	06, 14, 18, 25, 26
HERMES INTERNATIONAL			3233557	USA	06, 14, 18, 25, 26
HERMES INTERNATIONAL	LINDY	48/5/2008	3480825	USA	18


HERMES INTERNATIONAL		9	3561331	USA	06, 14, 16, 18, 21, 25, 26, 34
HERMES INTERNATIONAL		1	3936105	USA	18
HERMES INTERNATIONAL			3939358	USA	18
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HERMES INTERNATIONAL		2/17/2015	4687132	USA	25, 26

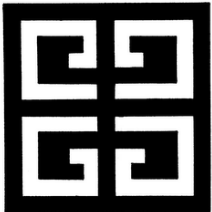
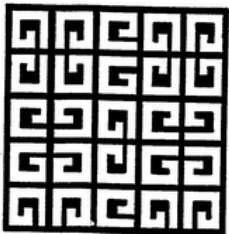
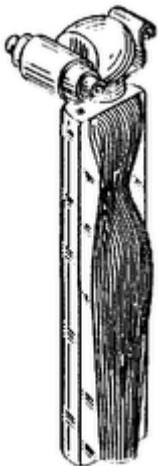
KENZO


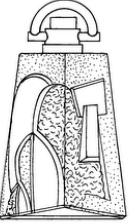
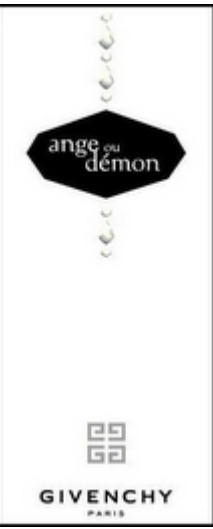
<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>
KENZO	3	Perfumery	Jan. 8, 1985	1312942
KENZO JUNGLE	3	Perfumery, namely toilet waters, perfumes	Nov. 19, 1996	2017313

<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>
	3	Perfumery, namely, toilet water, cosmetics, namely, beauty creams for the face and the body, body lotions	Sep. 10, 2002	2616977
KENZOAMOUR	3	Perfumes; toilet water	June 20, 2006	3106879
UNIDENTIFIED FRAGRANCE OBJECT	3	Perfumery	Aug. 10, 2010	3832756
	3	Perfumery	Nov. 29, 2011	4062441

LVMH FRAGRANCE BRANDS

<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>
GIVENCHY	3	Perfume, toilet water, bath oil, face lotion and talcum powder	Sep. 5, 1972	942407
YSATIS	3	Toilet waters, cosmetic products--namely, perfumed body cream, perfumed body lotion	Aug. 13, 1985	1353577
XERYUS	3	Toilet water; personal soaps; personal deodorant	June 23, 1987	1443773
GIVENCHY 	3	Bath soaps; perfumes, toilet water and cologne; lotions and creams for shaving; lotions, milks, creams and gels for the face and body; cosmetic preparations for the bath, namely, - gels, talc and and personal deodorants (deodorant sticks)	May 23, 1989	1539965

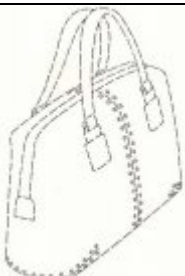
<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>
	3	Toilet soaps; perfumery; namely, perfumes, eau de cologne and toilet water; cosmetic preparations; namely, lotions, milks, creams and gels for the face and body, lipsticks, nail varnish, makeup foundation and powder, mascara, eye shadow, cosmetic pencils, beauty masks; suntan preparations; namely, gels and creams; cosmetic preparations for the bath; namely, gels, oils, creams, bath salts; deodorants for personal use	June 2, 1992	1689748
AMARIGE	3	Perfume, toilet water, cosmetic products; namely, lotions, milks, creams, gels for face and body, cosmetic preparations for the bath; namely, gels, creams, deodorant for personal use	Sep. 22, 1992	1717361
	3	Toilet water, toilet soap	Apr. 27, 1993	1767120
INSENSE	3	Perfumes, toilet water	Jan. 10, 1995	1872169
TARTINE ET CHOCOLAT	3	Toilet water	Mar. 10, 1998	2142392
	3	Perfume	Aug. 11, 1998	2180108
ORGANZA	3	Perfume	Aug. 25, 1998	2184436
HOT COUTURE	3	Perfumes, and toilet water, lotions, for the body, body gel	Feb. 13, 2001	2427861

<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>
	3	Toilet soaps, perfumes, toilet water, deodorants for personal use, after-shave lotions, preparations for hair, namely, shampoos	Sep. 18, 2001	2489772
	3	Toilet water	July 2, 2002	2587049
VERY IRRESISTIBLE GIVENCHY	3	Perfumes, perfumery, toilet waters, lotions for the body; deodorants for personal use	Oct. 24, 2006	3161498
ANGE OU DEMON	3	Perfumes, perfumery, cosmetics	Dec. 18, 2007	3357425
	3	Perfumes; eau de cologne and eau de toilette	Jan. 22, 2008	3371362
PLAY	3	Skin care products, namely, aftershave tonics; scented preparations, namely, eau de toilettes, fragrances for personal use	Nov. 3, 2009	3706948
GIVENCHY	3	Perfumery, cosmetics, makeup, non-medicated skin care preparations, non-medicated skin and facial cleaners, skin lightening preparations and non-medicated toiletries	Jan. 3, 2012	4079380


MICHAEL KORS, L.L.C.

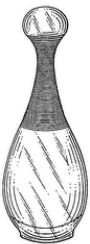
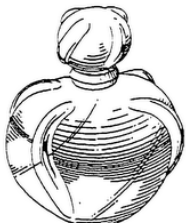
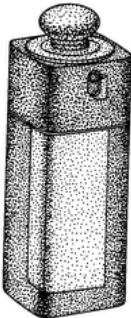

<u>TRADEMARK</u>	<u>REGISTRATION DATE</u>	<u>REGISTRATION NUMBER</u>	<u>GOODS and SERVICES</u>
MICHAEL KORS	June 4, 1996	1977507	25: Ladies' clothing; namely, dresses, jackets, pants, skirts, shirts, blouses, shorts, sweaters, coats, swimwear.
MICHAEL	April 1, 1997	2049326	25: Clothing for use by women; namely,

<u>TRADEMARK</u>	<u>REGISTRATION DATE</u>	<u>REGISTRATION NUMBER</u>	<u>GOODS and SERVICES</u>
KORS			<p>anoraks; aprons; ascots; babushkas; bandanas; bathrobes; belts; blazers; blousons; bodysuits; boleros; boots; boxer shorts; brassieres; briefs; caftans; camisoles; capes; caps; cardigans; chemises; clogs; fur coats; suit coats; corselets; culottes; earmuffs; galoshes; garter belts; girdles; gloves; nightgowns; halter tops; hats; headbands; hosiery; jeans; jogging suits; jumpers; jumpsuits; kerchiefs; kimonos; leggings; leotards; loungewear; mittens; moccasins; mufflers; neckerchiefs; neckties; neckwear; negligees; nightshirts; overalls; overshoes pajamas; panties; pantsuits; pantyhose; parkas; pedal pushers; peignors; pinafores; playsuits; pocket squares; ponchos; pullovers; raincoats; sandals; scarves; shawls; shorts; undershirts; athletic shoes; gym shorts; sweat shorts; ski suits; slacks; snowsuits; socks; sport coats; sport shirts; stockings; stoles; suits; suspenders; sweat pants; sweat shirts; t-shirts; trousers; tuxedos; underpants; vests; vested suits; and warm-up suits; and, clothing for use by men; namely, anoraks; ascots; bandanas; bathrobes; belts; blazers; boots; boxer shorts; briefs; capes; caps; cardigans; clogs; fur coats; suit coats; earmuffs; galoshes; gloves; hats; headbands; hosiery; jeans; jogging suits; kerchiefs; leotards; loungewear; mittens; moccasins; mufflers; neckerchiefs; neckties; neckwear; nightshirts; overalls; overshoes; pajamas; pantsuits; parkas; pedal pushers; playsuits; pocket squares; ponchos; pullovers; raincoats; sandals; scarves; shawls; shorts; undershirts; athletic shoes; gym shorts; sweat shorts; ski suits; slacks; snowsuits; socks; sport coats; sport shirts; suits; suspenders; sweat pants; sweat shirts; t-shirts; trousers; tuxedos; vests; vested suits; and warm-up suits.</p>
MICHAEL KORS	December 18, 2001	2520757	18: Handbags, billfolds, credit card cases, key cases, and tote bags.
MICHAEL KORS	December 18, 2001	2520758	9: Eyeglasses, eyeglass cases.
MICHAEL KORS	March 12, 2002	2547039	35: Retail store services in the fields of clothing, jewelry and clothing accessories.
MICHAEL KORS	April 22, 2003	2708259	3: Cosmetics; namely, body lotion, cologne, perfume, and shower gel.
MICHAEL MICHAEL KORS	April 11, 2006	3080631	14: Eyeglass frames, eyeglasses, sunglasses, eyeglass cases, carrying cases, namely, attaché cases; bags, namely, tote bags; luggage; suitcases; handbags; purses; wallets; men's and women's clothing, namely, dresses, skirts, blouses, pants, jackets, blazers, coats, raincoats, capes, ponchos, scarves, hats, gloves, sweaters,

<u>TRADEMARK</u>	<u>REGISTRATION DATE</u>	<u>REGISTRATION NUMBER</u>	<u>GOODS and SERVICES</u>
			belts, hosiery, bathing suits, halter tops, socks, jeans, warm up suits, sweatshirts, sweatpants, leggings, shorts, slacks, sport coats, sport shirts, suits, t-shirts, tuxedos, vests, ties; undergarments for men and women, namely, boxer shorts, bras, bustiers, camisoles, nightgowns, nightshirts, pajamas, panties, undershirts, underwear; footwear and headwear; belts.
MICHAEL KORS	October 17, 2006	3160981	14: Watches.
	December 18, 2007	3356080	18: Handbags and small leather goods, namely, wristlet bags.
MK MICHAEL KORS	May 27, 2008	3438412	9: Eyeglass frames, eyeglasses, sunglasses, eyeglass cases, eye shades, protective eye wear and eye wear for sports; handbags; men's and women's clothing, namely, dresses, skirts, blouses, pants, jackets, blazers, coats, raincoats, capes, ponchos, scarves, hats, gloves, sweaters, belts, hosiery, bathing suits, halter tops, socks, jeans, warm up suits, sweatshirts, sweatpants, leggings, shorts, slacks, sport coats, sport shirts, suits, T-shirts, tuxedos, vests, ties; undergarments for men and women, namely, boxer shorts, bras, bustiers, camisoles, nightgowns, nightshirts, pajamas, panties, undershirts, underwear, footwear and headwear; belts.
MK MICHAEL KORS	November 18, 2008	3535310	14: Watches.
MICHAEL KORS	November 8, 2011	4052748	14: Jewelry.
MICHAEL MICHAEL KORS	November 8, 2011	4052752	14: Jewelry and watches.
MICHAEL KORS	May 14, 2013	4334410	9: Protective cases, covers and carrying cases for mobile phones, portable media players, personal digital assistants, laptops and tablet computers.
MICHAEL MICHAEL KORS	May 14, 2013	4334409	9: Protective cases, covers and carrying cases for mobile phones, portable media players, personal digital assistants, laptops and tablet computers.

PARFUMS CHRISTIAN DIOR

<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>
Christian Dior	3 & 5	Face and body creams, skin, face and body powders, lipstick, rouge and filled rouge compacts, perfumes, toilet water	Apr. 21, 1953	573430
<i>Miss Dior</i>	3 & 5	Perfumes, toilet waters, skin creams and lotions	July 14, 1953	577253
DIORISSIMO	3 & 5	Cosmetics and toilet preparations- namely, perfumes, toilet water	July 19, 1960	701515
EAU SAUVAGE		Men's eau de cologne		884294
DIORESSENCE	3 & 5	Perfumes	Jan. 19, 1971	906347
DIORELLA	3	Perfumes, toilet water, eau de cologne	Jan. 8, 1974	976471
POISON	3	Perfumes, eaux de toilette, milks for the care of the body	Nov. 13, 1984	1304580
FAHRENHEIT	3	Perfumes, face creams	Apr. 5, 1988	1482938
DUNE	3	Cosmetics, namely, creams, lotions body, perfumery	Feb. 13, 1990	1582150
DOLCE VITA	3	Perfume, toilet waters	Dec. 31, 1996	2027819
CHRISTIAN DIOR	3	Perfumes, eau de cologne, toilet waters; perfumed body milks, body lotions, body gels, body oils and body powders; perfumed bath and shower gels, perfumed soaps, perfumed moisturizing body creams, personal deodorants for the body; pre-shave and after-shave lotions, shaving foams and gels, emulsions and balms; shampoos, gels and lotions for body, creams, milks, lotions, gels and emulsions for the care of the face, hands and body, cream and gel masks; exfoliating creams, lotions and gels; mascara, eye liner, eye shadow, blush, pressed powder, loose powder, foundation make-up, foundation cream, foundation base, moisturizing cream base, lipstick, nail enamel, base and top coat for nails, nail polish remover, face and eye make-up remover; cleansing milks, gels and lotions for the face	Apr. 28, 1998	2153858
	3	Perfume, toilet waters, perfumned body milk, perfumed bath and shower foams and gels, perfumed soaps, perfumed moisturizing creams	May 22, 2001	2453926

<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>
J'ADORE	3	Perfume and toilet waters	May 29, 2001	2455674
	3	Perfume, eau de parfum spray, toilet water	Jan. 15, 2002	2529417
	3	Perfumes	Apr. 30, 2002	2564970
J'ADORE	3	Perfume, eau de toilette, and milks for the care of the body	Mar. 11, 2003	2696047
HYPNOTIC POISON	3	Perfume, toilet waters, perfumed body milk, perfumed bath and shower foams and gels	Oct. 7, 2003	2771657
FAHRENHEIT	3	Eau de toilette, summer eau de toilette, after-shave, after-shave balm, personal deodorants, shower gels	Mar. 16, 2004	2823387
	3	Perfume, toilet waters	Mar. 23, 2004	2824987
DIOR ADDICT	3	Perfume, toilet waters, lipstick	July 27, 2004	2867329
PURE POISON	3	Perfumery	Aug. 17, 2004	2874846
	3	Perfumery; cosmetics	June 21, 2005	2963354

<u>Trademarks</u>	<u>Classes</u>	<u>List of Goods</u>	<u>Registration Date</u>	<u>Registration No.</u>
	3	Perfumes	Oct. 25, 2005	3008784
EAU NOIRE	3	Perfumes	Dec. 27, 2005	3034741
<i>Miss Dior Chérie</i>	3	Perfumes	Apr. 25, 2006	3085164
	3	Perfumes, eau de cologne, eau de toilette, milks, lotions, creams, emulsions, and perfumed gels for body and face care	June 13, 2006	3104002
	3	Perfumery, perfumes, toilet waters	Nov. 28, 2006	3176192
DIOR	3	Soaps, perfumes, perfumery, cosmetics, non-medicated skin care preparations, shaving preparations, personal deodorants, shower and bath gel, sun screen preparations, and hair care preparations	Sept. 25, 2007	3297261
DIOR	3	Soaps, perfumes, perfumery, cosmetics, non-medicated skin care preparations, shaving preparations, personal deodorants, shower and bath gel, sun screen preparations, and hair care preparations	Sep. 25, 2007	3297261
LA COLLECTION PARTICULIERE	3	Perfumes, perfumery, eau de cologne	Oct. 28, 2014	4628811
SAUVAGE	3	Perfumery; toilet water; cosmetics; after-shave lotions; after-shave balms; deodorant for personal use; perfumed gels for the shower	Oct. 10, 2017	5304379

PRL USA HOLDINGS, INC.

<u>Trademark</u>	<u>Registration No.</u>	<u>Registration Date</u>	<u>Goods</u>
POLO	1,363,459	10/1/85	Clothing-namely, suits, slacks, trousers, shorts, wind resistant jackets, jackets, blazers, dress shirts, sweatshirts, sweaters, hats, belts, socks, blouses, skirts, coats, and dresses.
POLO	1,446,173	7/7/87	Frames for prescription and non-prescription lenses, and complete sunglasses.
RALPH LAUREN	1,447,282	7/14/87	Frames for prescription and non-prescription lenses and complete sunglasses.
POLO	1,508,314	10/11/88	Men's suits, slacks, ties, sweaters, jackets, coats, shoes, shirts, hats, belts and socks and ladies' blouses, skirts, suits and dresses.
RALPH LAUREN word mark	1,624,989	11/27/90	Clothing - namely, suits, slacks, trousers, shorts, wind resistant jackets, jackets, blazers, dress shirts, knit shirts, sweatshirts, sweaters, hats, belts, socks, blouses, skirts, coats and dresses.
RALPH LAUREN	1,835,393	5/10/94	Jewelry.
DOUBLE RL	1,876,705	1/31/95	Wearing apparel; namely, jeans, jackets, T-shirts, sweaters, slacks, woven shirts, vests, ties, hats, sweatshirts, overalls and belts.
RRL DESIGN	1,891,143	4/25/95	Wearing apparel; namely, jeans, jackets, T-shirts, sweaters, slacks, woven shirts, vests, ties, hats, sweatshirts, overalls and belts.
PRL AND DESIGN	1,932,955	11/7/95	Wearing apparel, namely jeans, jackets, T-shirts, sweaters, slacks, woven shirts, vests, ties, hats, sweatshirts, overalls and belts.
POLO SPORT	1,951,601	1/23/96	Wearing apparel, namely pants, shorts, jackets, T-shirts, sport shirts, knit shirts, sweatshirts, hats, socks and footwear.
RALPH LAUREN	1,976,324	5/28/96	Clutches, shoulder bags, cosmetic bags, tote bags, saddle bags, backpacks, gym bags, duffle bags, travel bags, circular cosmetic and personal grooming bags, clothing and personal item bags with drawstrings for over the shoulder use, grooming kits in the nature of small traveling bags for carrying personal hygiene items, traveling bags designed for holding suits, tie cases, satchels, purses and other personal item bags with rigid top supports, garment bags for travel, traveling bags for carrying personal items and clothing, coin bags, drawstring pouches, overnight bags, wallets and key holders, all sold empty.

<u>Trademark</u>	<u>Registration No.</u>	<u>Registration Date</u>	<u>Goods</u>
POLO JEANS CO.	2,049,948	4/1/97	Wearing apparel, namely, jeans, T-shirts, knit shirts, sweatshirts, overalls, blouses, skirts, dresses and hats.
DESIGN ONLY polo player astride horse	2,052,315	4/15/97	Clutches, shoulder bags, cosmetic bags sold empty, tote bags, saddle bags, backpacks, gym bags, duffle bags, travel bags, roll bags, sling bags, grooming kits sold empty, suit bags, tie cases, satchels, pole bags, garment bags for travel, coin purses, drawstring pouches, overnight bags, wallets and key cases.
POLO RALPH LAUREN with the horse and polo rider emblem	2,077,082	7/8/97	Clutches, shoulder bags, cosmetic bags sold empty, tote bags, saddle bags, backpacks, gym bags, duffle bags, travel bags, roll bags, sling bags, grooming kits sold empty, suit bags, tie cases, satchels, garment bags for travel, coin purses, drawstring pouches, overnight bags, wallets and key cases.
RALPH	2,175,394	7/21/98	Frames for prescription and non-prescription lenses, and complete sunglasses.
CHAPS	2,137,833	2/17/98	Frames for prescription and non-prescription lenses, and complete sunglasses.
LAUREN	2,246,900	5/25/99	Wearing apparel, namely, topcoats, raincoats, jackets, suit jackets, suit coats, sport coats, sport jackets, blazers, blouses, shirts, shirt jackets, pants, skirts, dresses, sweaters, tee shirts, hats and scarves.
RLX	2,276,536	9/7/99	Wearing apparel, namely, pants, shorts, jackets, coats, woven shirts, T-shirts, knit shirts, sweaters, sweatshirts, blouses, skirts, dresses, hats, footwear, socks, hosiery and gloves.
RL	2,312,818	2/1/00	Wearing apparel, namely, jeans, jackets, woven shirts, T-shirts, knit shirts, sweatshirts, overalls, pants, sweaters, shorts, vests, ties, bathing suits, scarves, hosiery, bodysuits, belts, blouses, skirts, dresses, coats, hats and shoes.
RUGBY	2,339,652	4/11/00	Men's and women's clothing not specifically adapted to be worn while playing rugby, namely, jackets, vests, shirts, sweatshirts, t-shirts, men's shorts and pants, and women's shorts, dresses, blouses, [scarves,] belts and shoes
LAUREN	2,419,959	1/9/01	Handbags, clutches, shoulder bags, tote bags, backpacks, duffle bags, travel bags, suit bags, satchels, garment bags for travel, coin purses, drawstring pouches, overnight bags, wallets and key cases.
CHAPS	2,505,790	11/13/01	Clothing, namely, sport shirts, sweaters, sweatshirts, t-shirts, shorts, jackets, pants, sport jackets and suits.
RALPH	2,527,823	1/8/02	Clutches, shoulder bags, cosmetic bags sold empty, tote bags, saddle bags, backpacks, gym bags, duffle bags, travel bags, roll bags, sling bags, grooming kits sold empty, suit bags, tie cases, satchels, garment bags for travel, coin purses, drawstring pouches, overnight bags, wallets and key cases.
POLO GOLF	2,686,291	2/11/03	Wearing apparel, namely, shirts, sweaters, pants, sweatshirts and t-shirt.

<u>Trademark</u>	<u>Registration No.</u>	<u>Registration Date</u>	<u>Goods</u>
PINK PONY	3,036,422	12/27/05	Clothing – namely, sweaters and t-shirts.
RL	3,120,485	7/25/06	Eyeglasses, sunglasses, cases for eyeglasses and sunglasses.
RALPH LAUREN GOLF	3,213,555	2/27/07	Sports and leisure wear, namely, shorts, pants, golf trousers, t-shirts, polo shirts, rugby shirts, golf shirts, tank tops, jerseys, tights, stockings, leotards, unitards, body suits, leg warmers, leggings, socks, gloves, athletic uniforms, jackets, parkas, ponchos, swimwear, sweaters, fleece pullovers, sweat suits, jogging suits, rain suits, boots, slippers, sandals, athletic footwear, hats, caps, visors, head bands, wrist bands, tennis wear, golf wear, namely, shoes and shirts; ski wear; wearing apparel namely, slacks, jeans, belts, suspenders, shirts, twin sets, ties, men's and women's suits, vests, undergarments, sweaters, blazers, coats, scarves, shawls, robes, sleepwear, loungewear and all purpose footwear excluding orthopedic footwear.
RALPH LAUREN TENNIS	3,215,910	3/6/07	Sports and leisure wear, namely, shorts, pants, golf trousers, t-shirts, polo shirts, rugby shirts, golf shirts, tank tops, jerseys, tights, stockings, leotards, unitards, body suits, leg warmers, leggings, socks, gloves, athletic uniforms, jackets, parkas, ponchos, swimwear, sweaters, fleece pullovers, sweat suits, jogging suits, rain suits, boots, slippers, sandals, athletic footwear, hats, caps, visors, head bands, wrist bands, tennis wear, golf wear, namely, shoes and shirts; ski wear; wearing apparel namely, slacks, jeans, belts, suspenders, shirts, twin sets, ties, men's and women's suits, vests, undergarments, sweaters, blazers, coats, scarves, shawls, robes, sleepwear, loungewear and all purpose footwear excluding orthopedic footwear.
RALPH LAUREN SPORT	3,218,130	3/13/07	Sports and leisure wear, namely, shorts, pants, golf trousers, t-shirts, polo shirts, rugby shirts, golf shirts, tank tops, jerseys, tights, stockings, leotards, unitards, body suits, leg warmers, leggings, socks, gloves, athletic uniforms, jackets, parkas, ponchos, swimwear, sweaters, fleece pullovers, sweat suits, jogging suits, rain suits, boots, slippers, sandals, athletic footwear, hats, caps, visors, head bands, wrist bands, tennis wear, golf wear, namely, shoes and shirts; ski wear; wearing apparel namely, slacks, jeans, belts, suspenders, shirts, twin sets, ties, men's and women's suits, vests, undergarments, sweaters, blazers, coats, scarves, shawls, robes, sleepwear, loungewear and all purpose footwear excluding orthopedic footwear.
C (Stylized)	3,225,869	4/3/07	Wearing apparel, namely, sport shirts, knit shirts, sweaters, sweatshirts, t-shirts, blouses, shorts, jackets, pants, jeans, overalls, skirts, dresses, hats, socks and swimwear.
CHAPS	2,137,833	2/17/98	Frames for prescription and non-prescription lenses and complete sunglasses

<u>Trademark</u>	<u>Registration No.</u>	<u>Registration Date</u>	<u>Goods</u>
PINK PONY	3,245,586	5/22/07	Wearing apparel, namely, jackets, sweatshirts, sweat pants, hats, scarves, jerseys, jeans, turtlenecks and bikinis.
LAUREN JEANS COMPANY	3,254,299	6/19/07	Wearing apparel, namely, jeans, vests, jackets, coats, shirts, sweatshirts, overalls, blouses, skirts, dresses, hats, pants, socks, gloves and footwear.
RL	3,687,528	9/22/09	Handbags, clutches, shoulder bags, tote bags, backpacks, saddle bags, duffle bags, travel bags, suit bags, satchels, hip packs, roll bags, carryalls, garment bags, suit cases, coin purses, drawstring pouches, briefcases, attaché cases, wallets, key cases, billfolds, tie cases, credit card cases, business card cases, grooming kits sold empty, cosmetics and toilet bags sold empty, shaving bags sold empty, and umbrellas.
DESIGN ONLY	4,169,636	7/10/12	Handbag.
DENIM & SUPPLY RALPH LAUREN	4,430,736	11/12/13	Belts, blouses, coats, dresses, hats, jackets, pants, scarves, shirts, shorts, skirts, t-shirts and tops.
DENIM & SUPPLY RALPH LAUREN	4,438,197	11/26/13	Handbags.
POLO	1,532,557	4/4/89	Lotions for use after shaving
RALPH	2,562,975	4/23/02	Eau de toilette, skin and body lotions
LAUREN	1,489,796	5/31/88	Toilet water
RALPH LAUREN	1,222,278	1/4/83	Cologne, aftershave, aftershave balm, antiperspirant, personal deodorant, toilet water, body lotion, bath oil, body powder, perfume
Horse & Polo Rider Design	1,212,060	10/12/82	Cologne, aftershave, aftershave balm, antiperspirant, toilet water
RL	2,891,892	10/5/04	Fragrances, namely, eau de toilette, namely, after-shave splash, after-shave balm
RALPH LAUREN ROMANCE	2,318,372	2/15/00	Eau de parfum
POLO RED	4,506,000	4/1/14	Eau de toilette, after shave preparations, body spray, and personal deodorant
POLO BLUE	2,782,617	11/11/03	Eau de toilette, after shave gel, shower gel, and personal deodorant
POLO SPORT	1,858,094	10/11/94	Toilette water, deodorants
POLO BLACK	3,130,913	8/15/06	Eau de toilette, after shave splash, after shave gel, shower gel, personal deodorant
LAUREN RALPH LAUREN	1,160,547	7/14/81	Cologne, toilet water, body lotion, and perfume
CHAPS	3,358,110	12/18/07	Eau de toilette

(hereinafter collectively referred to as “Plaintiffs’ Federally Registered Trademarks”);

(b) From receiving, manufacturing, distributing, advertising, promoting, returning, offering for sale or otherwise disposing of in any manner, holding for sale or selling any goods, labels, tags, logos, decals, emblems, signs, and other forms of markings,

any packaging, wrappers, pouches, containers and receptacles, and any catalogs, price lists, promotional materials and the like bearing a copy or colorable imitation of Plaintiffs' Federally Registered Trademarks;

(c) From using any logo, trade name or trademark which may be calculated to falsely represent or which has the effect of falsely representing that the services or products of Defendants are sponsored by, authorized by, or in any way associated with Plaintiffs;

(d) From infringing Plaintiffs' Federally Registered Trademarks;

(e) From falsely representing themselves as being connected with Plaintiffs or sponsored by or associated with Plaintiffs;

(f) From using any reproduction, counterfeit, copy, or colorable imitation of Plaintiffs' Federally Registered Trademarks in connection with the publicity, promotion, sale, or advertising of goods sold by Defendants including, without limitation, apparel, belts, cosmetics, eyewear, footwear, handbags, jackets, jewelry, perfumes, wallets, watches, and other products bearing a copy or colorable imitation of Plaintiffs' Federally Registered Trademarks;

(g) From affixing, applying, annexing, or using in connection with the sale of any goods, a false description or representation, including words or other symbols tending to falsely describe or represent such goods as being those of Plaintiffs and from offering such goods in commerce;

(h) From using any trademark or trade name in connection with the sale of any goods which may be calculated to falsely represent such goods as being connected with, approved by or sponsored by Plaintiffs; and

(i) From destroying, altering, disposing of, concealing, tampering with or in any manner secreting any and all business records, invoices, correspondence, books of account,

receipts or other documentation relating or referring in any manner to the manufacture, advertising, receiving, acquisition, importation, purchase, sale or offer for sale, or distribution of any merchandise bearing Plaintiffs' Federally Registered Trademarks.

2. Defendants, their principals, officers, agents, servants, employees and attorneys and all persons in active concert or participation with them are hereby enjoined, from transferring, discarding, destroying or otherwise disposing of the following currently in the possession, custody or control of Defendants:

(a) All merchandise bearing any copy or counterfeit of Plaintiffs' Federally Registered Trademarks or any markings substantially indistinguishable therefrom;

(b) All labels, tags, logos, emblems, watch faces, signs, and other forms of markings, all packaging, wrappers, pouches, containers, receptacles, and all advertisements, catalogs, price lists, guarantees, promotional materials and the like bearing any copy or counterfeit of Plaintiffs' Federally Registered Trademarks or any markings substantially indistinguishable therefrom, and all plates molds, dies, tooling, machinery, assembly equipment and other means of making the same; and

(c) All books and records showing:

(i) Defendants manufacture, receipt and sale of merchandise bearing Plaintiffs' Federally Registered Trademarks; and

(ii) Defendants' manufacture, receipt and sale of any labels, tags, logos, decals, emblems, signs, and other forms of markings, any packaging, wrappers, pouches, containers and receptacles, and any catalogs, price lists, guarantees, promotional materials and the like bearing Plaintiffs' Federally Registered Trademarks, either by reference to such trademarks or by style or code number or otherwise.

3. The parties may take immediate and expedited discovery, limited to document requests and interrogatories, without regard to the time limitations set forth in Rules 30, 33, 34 and 36 of the Federal Rules of Civil Procedure.

4. The seizures outlined in the opening paragraph are hereby confirmed, and the counterfeit goods seized pursuant to the Court's Seizure Order may be destroyed after the appropriate 10 days' notice is given to the United States Attorney for the Southern District of New York, as provided for in 15 U.S.C. § 1118.

5. Service of this Order by first-class mail to the Defendants at their home or business addresses shall constitute sufficient service of this Order. Service shall be deemed complete on the mailing of this Order as permitted above.

6. All papers under seal in this action to date are now unsealed. No later than September 27, 2019, Plaintiffs shall file on ECF any paper not yet filed publicly.

7. Plaintiffs are granted an extension, until October 18, 2019, to submit their letter updating the Court on the status of the investigation of all Defendants' identities and their plans with respect to amendment of the complaint and the like.

Dated: September 25, 2019

SO ORDERED:



JESSE M. FURMAN
UNITED STATES DISTRICT JUDGE